



DEPARTMENT ORDER

**Irving Forest Products, Inc.**  
**Oxford County**  
**Dixfield, Maine**  
**A-409-77-4-M**

**Departmental**  
**Findings of Fact and Order**  
**New Source Review**  
**NSR #4**

**FINDINGS OF FACT**

After review of the air emission license application, staff investigation reports, and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 Maine Revised Statutes (M.R.S.) § 344 and § 590, the Maine Department of Environmental Protection (the Department) finds the following facts:

**I. REGISTRATION**

**A. Introduction**

FACILITY	Irving Forest Products, Inc.
LICENSE TYPE	06-096 C.M.R. ch. 115, Minor Revision
NAICS CODES	321912, 321113, 321999
NATURE OF BUSINESS	Lumber Manufacturer
FACILITY LOCATION	24 Hall Hill Road, Dixfield, Maine

**B. NSR License Description**

Irving Forest Products, Inc. (IFP) has requested a New Source Review (NSR) license to replace the existing Planer Mill and some components of the facility's dust and shavings collection system. Facility changes may also include improvements in process flow, upgrades to the trimming and finishing area, and process improvements and consolidation of the Remanufacturing, Value-Added, and Specialty Mill areas. Throughout this license, this work will be referred to collectively as the Planer Mill Project.

**C. Emission Equipment**

The following existing equipment is proposed to be removed/replaced:

**Process Equipment**

<b>Equipment</b>	<b>Throughput*</b>
Cyclone #1 (Value Added Shavings)	6,000 tpy
Cyclone #2 (Planer Mill Shavings)	25,000 tpy
Cyclone #3 (Bagger Silo)	25,000 tpy
Cyclone #4 (Shavings Hopper)	25,000 tpy

The following existing equipment is proposed to be changed:

Equipment	Throughput*
Cyclone #5 (Planer Mill Hog and VA Mill Truck Bin)	13,000 tpy

The following new equipment is proposed to be added:

Equipment	Throughput*
Cyclone #1A (Specialty Mill)	6,000 tpy
Cyclone #2A & 2B (Planer Mill Shavings)	25,000 tpy
Cyclone #3A (Shavings Silo)	25,000 tpy
Cyclone #4A (Shavings Truck Bin)	25,000 tpy

\*The listed throughputs represent typical process throughput rates, not the maximum load rating of the cyclones.

#### D. Project Description

The Planer Mill Project will involve changes to the facility's dust and shavings collection system.

The existing Cyclone #1 which served the Value Added (VA) Shop was removed in May 2019. Cyclones #2, #3, and #4 are planned to be decommissioned in February 2020.

Cyclone #1A will serve the Specialty Mill and will receive primarily shavings from the Specialty Mill's molder. The discharge of Cyclone #1A will be injected into the high-pressure line prior to a two-way valve which will direct material to either Cyclone #3A or #4A.

Existing Cyclone #2 is being replaced by a "two-pack, high-efficiency, cyclone complex," designated Cyclone #2A & 2B. This area is the converging point for the Planer Mill shavings and Planer Mill trim saw. This cyclone complex includes an inlet splitter section and two high-efficiency cyclones that operate in parallel. The exhaust of Cyclone #2A & 2B will be drawn through ductwork by an induced draft fan and then discharged to atmosphere.

Existing Cyclone #3 serving the Bagger Silo will be replaced by a new unit designated as Cyclone #3A. Existing Cyclone #4 serving the Shavings Hopper will be replaced by a new unit designated as Cyclone #4A.

Existing Cyclone #5 serves the Planer Mill Chip Hopper. The Planer Mill Project will add the VA Mill Shavings exhaust to this unit. This will cause this cyclone to occasionally have an increased load. IFP has calculated that the increased loading is still within the unit's design capacity.

Following is an updated list of facility cyclones:

Equipment	Throughput*
Cyclone #1A (Specialty Mill)	6,000 tpy
Cyclone #2A & 2B (Planer Mill Shavings)	25,000 tpy
Cyclone #3A (Shavings Silo)	25,000 tpy
Cyclone #4A (Shavings Truck Bin)	25,000 tpy
Cyclone #5 (Planer Mill Hog and VA Mill Truck Bin)	13,000 tpy
Cyclone #6 (Boiler #1&#2 Fuel Silos)	1,000 tpy
Cyclone #6A	Out of Service Prior to 1999
Cyclone #7 (Boilers #1&#2 Fuel Input)	14,000 tpy

\*The listed throughputs represent typical process throughput rates, not the maximum load rating of the cyclones.

E. Application Classification

All rules, regulations, or statutes referenced in this air emission license refer to the amended version in effect as of the issued date of this license.

The application submitted by IFP does not violate any applicable federal or state requirements and does not reduce monitoring, reporting, testing, or recordkeeping requirements.

The Planer Mill Project involves physical changes to the Planer Mill and the facility's dust and shavings collection system. Although not quantified, it is expected that the upgrades to the facility's dust and shavings collection system will result in lower emissions of particulate matter.

The Planer Mill Project is expected to result in efficiency improvements and reductions in energy use. The new Planer Mill will have an increased hourly throughput capacity, allowing planing operations to be completed more quickly. However, this project will not increase the overall throughput of lumber, which is limited by the facility's drying kilns. Therefore, there will be no increase in emissions from any unit upstream or downstream of the Planer Mill due to this project.

Since there are no actual emissions increases expected from the Planer Mill Project, this change is determined not to be a modification. Therefore, this NSR license is determined to be a minor revision under *Minor and Major Source Air Emission License Regulations* 06-096 Code of Maine Rules (C.M.R.) ch. 115. An application to incorporate the requirements of this NSR license into the Part 70 air emission license shall be submitted no later than 12 months from commencement of operations associated with the Planer Mill Project.

## II. BEST PRACTICAL TREATMENT (BPT)

### A. Introduction

In order to receive a license, the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in *Definitions Regulation*, 06-096 C.M.R. ch. 100. Separate control requirement categories exist for new and existing equipment as well as for those sources located in designated non-attainment areas.

BPT for new sources and modifications requires a demonstration that emissions are receiving Best Available Control Technology (BACT), as defined in 06-096 C.M.R. ch. 100. BACT is a top-down approach to selecting air emission controls considering economic, environmental, and energy impacts.

### B. Cyclones #1A, #2A & 2B, #3A, #4A, and #5

IFP has proposed the Planer Mill Project which will result in changes in the operation of Cyclone #5 and installation of new Cyclones #1A, #2A & 2B, #3A, and #4A.

The facility's cyclones are both process equipment (because they move material throughout the facility) and control equipment (because they remove particulate matter from the exhaust stream).

BACT for emissions of particulate matter from the Planer Mill Project is determined to be good operation and maintenance practices for the cyclones demonstrated by records of monthly inspections and of all maintenance activities performed. IFP shall monitor and record the pressure drop across each cyclone at least once per month.

Visible emissions from any general process source, including any facility cyclone, shall not exceed an opacity of 20% on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 3(B)(4)]

C. Incorporation Into the Part 70 Air Emission License

Per *Part 70 Air Emission License Regulations*, 06-096 C.M.R. ch. 140 § 1(C)(8), for a modification at the facility that has undergone NSR requirements or been processed through 06-096 C.M.R. ch. 115, the source must apply for an amendment to their Part 70 license within one year of commencing the proposed operations, as provided in 40 C.F.R. Part 70.5.

D. Annual Emissions

This NSR license will not change the facility's licensed annual emissions.

III. AMBIENT AIR QUALITY ANALYSIS

IFP previously submitted an ambient air quality analysis demonstrating that emissions from the facility, in conjunction with all other sources, do not violate ambient air quality standards (see license A-409-71-O-A, issued on 1/19/01). An additional ambient air quality analysis is not required for this NSR License.

**ORDER**

The Department hereby grants New Source Review Minor Revision A-409-77-4-M pursuant to the preconstruction licensing requirements of 06-096 C.M.R. ch. 115 and subject to the standard and specific conditions below.

Severability. The invalidity or unenforceability of any provision of this License or part thereof shall not affect the remainder of the provision or any other provisions. This License shall be construed and enforced in all respects as if such invalid or unenforceable provision or part thereof had been omitted.

**SPECIFIC CONDITIONS**

(1) **Facility Cyclones**

A. IFP shall conduct and maintain records of the following:

1. Monthly inspections of each cyclone.
2. Pressure drop across each cyclone recorded at least once per month.
3. Maintenance activities (scheduled or unscheduled) performed on each cyclone.  
[06-096 C.M.R. ch. 115, BPT]

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- B. Visible emissions from any general process source, including any facility cyclone, shall not exceed an opacity of 20% on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 3(B)(4)]
- (2) IFP shall submit an application to incorporate this NSR license into the facility's Part 70 air emission license no later than 12 months from commencement of the requested operation. [06-096 C.M.R. ch. 140 § 1(C)(8)]

DONE AND DATED IN AUGUSTA, MAINE THIS 24<sup>th</sup> DAY OF February, 2020.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: 

GERALD D. REID, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 1/27/2020

Date of application acceptance: 1/29/2020

Date filed with the Board of Environmental Protection:

This Order prepared by Lynn Muzzey, Bureau of Air Quality.

